REMARKS

Reconsideration of the application is respectfully requested for the following reasons:

1.   Amendments to Claims/New Issues/New Matter

Claims 1 and 6 have been amended to correct the antecedence error, by changing "dynamic prompt table file" to –prompt table file–.

This change clearly does not raise new issues or introduce new matter, and therefore entry of the amendment is respectfully requested.

2.   Rejection of Claims 1-10 Under 35 USC §103(a) in view of U.S. Patent Publication No. 2002/0147913 (Yun Lip) and U.S. Patent No. 6,021,491 (Renaud)

This rejection is respectfully traversed on the grounds that the Yun Lip publication and the Renaud patent fail to disclose or suggest a PINpad terminal, as claimed, that authenticates prompt table files loaded into the terminal. Neither the Yun Lip publication nor the Renaud patent even remotely concerns **loading** of prompt table files into a terminal, much less authentication of the files.

Conventionally, prompt table files are programmed into terminal firmware during manufacture of the terminal, and therefore no special protection of the files is required (other than securing the terminal manufacturing facility). The invention, on the other hand, is to enable the prompt table files to be updated *in situ* by downloading the files to a terminal (the claimed *"loading of the file into the terminal."*). None of the references of record provides for such file loading, much less authentication of the files upon loading, nor is there any suggestion of the advantages of loading prompt table files (PINpad versatility) or of a need for authentication of the files, which make loading after manufacture possible.

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According to the Examiner, the Lun Yip patent discloses downloading of prompt table files to a PINpad. However, the Lun Yip patent actually discloses a telephone that can be used to enter PINs, *and that is not disclosed as including any sort of prompt table, much less the capability of having prompt table files downloaded thereto.* <u>Even if the telephone of Lun Yip were deemed to include a prompt table, there is no suggestion that the prompt table can be updated by loading a prompt table file into the telephone.</u> It is noted that the rejection does not even mention this feature, which is completely lacking in the telephone of Lun Yip.

While it is certainly known to authenticate files, and to use prompt table files in a PINpad, the prior art does not disclose or suggest securely *loading* of the prompt table files into the PIN pad, in the manner claimed, in order to enable the PINpad to be more easily and conveniently configured. As noted in the background section of the present application, prompt tables are usually implemented by firmware, with no provision for updating the files by download. Even if the Lun Yip publication were directed to a "PINpad," Lun Yip does not contain any suggestion of downloading a prompt table file having the claimed functions to the "PINpad" or telephone.

In fact, there is absolutely <u>no</u> discussion in Lun Yip of how the prompts are controlled or, if a prompt table is used, how the prompt table is implemented or whether it can be updated. Furthermore, the keypad of Lun Yip does not appear to have any function corresponding to the claimed non-PIN data enablement *"if and only if"* an appropriate prompt has been, and continues to be, displayed at the time of data entry, nor is there any conceivable reason why a telephone of the type disclosed by Lun Yip should include such a function.

The Renaud patent does not make up for the lack of a teaching in the Lun Yip publication of loadable prompt table files, much less loadable prompt table files protected by authentication, since it merely discloses an example of file authentication in computer-to-computer data transmissions.

The Applicants have never argued that they invented file authentication or PINpads, as the Examiner appears to believe. Instead, the invention specifically involves **loading** of **prompt table files** into a PINpad, and authentication of the **prompt table files** to ensure that malicious prompt table files cannot be downloaded. Neither the Lun Yip publication nor the Renaud patent, whether considered individually or in any reasonable combination, discloses or suggests downloading of files to a PINpad, much less use of its file authentication method in connection with downloading of prompt table files to PINpad.

Claim 1 of the present application specifically recites:

> . . .*a numeric keypad including a plurality of numeric keys through which data is input, **processing of said data being initiated by at least one prompt table file in response to display of prompts listed in the prompt table**,*

and further that:

> . . .*said **prompt table file** is arranged to permit numeric keys on the keypad to be used for entry of non-PIN data if and only if an appropriate prompt has been, and continues to be, displayed at the time of data entry,*

and finally that:

> . . .*said system further comprises a file authentication arrangement for authenticating said prompt table file **upon loading of the prompt table file in the terminal.**.*

The Examiner will note that this claim language specifically recites a prompt table that controls display of prompts and entry data in response to the prompts, and further recites <u>authentication of the prompt table file as it is **loaded** into the terminal</u>. **There is absolutely no suggestion in either the Lun Yip publication or the Renaud patent of loading prompt table files into a terminal, and therefore no need for the claimed authentication.**

Since neither the Lun Yip publication nor the Renaud patent even remotely suggests any features of the claimed invention, it is respectfully submitted that the rejection of claims 1-10 under 35 USC §103(a) is improper and withdrawal of the rejection is believed to be appropriate.

Having thus overcome the sole rejection made in the Official Action, withdrawal of the rejections and expedited passage of the application to issue is requested.

Respectfully submitted,

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